

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No: 05-11652-WGY

PLAINTIFF'S MOTION TO SEQUESTER

Plaintiff John D. Cerqueira, pursuant to Federal Rule of Evidence 615, respectfully requests that the Court sequester the witnesses in the above-captioned trial. In support of his motion, Plaintiff states that counsel should be afforded the opportunity to test the memory, the accuracy, the type of experience and judgment of each witness without that witness having heard or discussed the examination of any other witnesses who have previously testified.

WHEREFORE, the Plaintiff respectfully requests that this Court grant this Motion to Sequester and thereby ensure that the jury will be afforded a full and fair opportunity to assess the credibility of all witnesses in this matter.

Respectfully submitted,
JOHN D. CERQUEIRA,

By his attorneys,

/s/ David S. Godkin

David S. Godkin (BBO #196530)
Darleen F. Cantelo (BBO#661733)
Birnbaum & Godkin, LLP
280 Summer Street
Boston, MA 02210
617-307-6100

CERTIFICATE OF SERVICE

I, David S. Godkin, Esq., hereby certify that a true and correct copy of the foregoing document was delivered to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent those indicated as non-registered participants on January 3, 2007.

/s/ David S. Godkin
David S. Godkin

Michael T. Kirkpatrick, Esq.
Public Citizen Litigation Group
1600 20th Street, NW
Washington, DC 20009
(202) 588-1000

ATTORNEYS FOR PLAINTIFF